

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CISCO SYSTEMS, INC. and	)	
ACACIA COMMUNICATIONS, INC.,	)	
	)	
Plaintiffs,	)	
	)	C. A. No. 21-1365 (GBW)
v.	)	
	)	
RAMOT AT TEL AVIV UNIVERSITY	)	
LTD.,	)	
	)	
Defendant.	)	
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CISCO SYSTEMS, INC. and	)	
ACACIA COMMUNICATIONS, INC.,	)	
	)	
Plaintiffs,	)	
	)	C. A. No. 22-674 (GBW)
v.	)	(CONSOLIDATED)
	)	
RAMOT AT TEL AVIV UNIVERSITY	)	
LTD.,	)	
	)	
Defendant.	)	

**PLAINTIFFS CISCO SYSTEMS, INC. AND ACACIA COMMUNICATIONS, INC.’S  
MOTION TO STRIKE**

Plaintiffs Cisco Systems, Inc. and Acacia Communications, Inc. (“Plaintiffs”) hereby move to strike the 15 new products accused of infringement identified in Defendant Ramot at Tel Aviv University Ltd. (“Ramot”)’s Final Infringement Contentions.

The basis for this motion is set forth in Plaintiffs’ opening letter brief filed herewith.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Jennifer Ying*

OF COUNSEL:

L. Norwood Jameson  
Matthew C. Gaudet  
Sajid Saleem  
Daniel Mitchell  
DUANE MORRIS LLP  
1075 Peachtree Street NE, Suite 1700  
Atlanta, GA 30309-3929  
(404) 253-6900

Joseph A. Powers  
DUANE MORRIS LLP  
30 South 17th Street  
Philadelphia, PA 19103-4196  
(215) 979-1000

Holly E. Engelmann, P.C.  
DUANE MORRIS LLP  
Terrace 7  
2801 Via Fortuna, Suite 200  
Austin, TX 78746-7567  
(214) 257-7226

December 10, 2024

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Jennifer Ying (#5550)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
jying@morrisnichols.com

*Attorneys for Plaintiffs Cisco Systems, Inc. and  
Acacia Communications, Inc.*

**RULE 7.1.1 CERTIFICATE**

I hereby certify that counsel for the parties, including lead and Delaware counsel, discussed the subject of the foregoing motion and were unable to reach agreement.

*/s/ Jennifer Ying*

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Jennifer Ying (#5550)

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	)	
RAMOT AT TEL AVIV UNIVERSITY	)	
LTD.,	)	
	)	
Defendant.	)	

**[PROPOSED] ORDER**

Having considered Plaintiffs Cisco Systems, Inc. and Acacia Communications, Inc.'s Motion to Strike, **IT IS HEREBY ORDERED** that:

1. Plaintiffs' Motion to Strike is GRANTED.
2. The following products are STRICKEN from Defendant Ramot at Tel Aviv University Ltd.'s Final Infringement Contentions:
  - AC100;
  - QSFP-DD 400G Ultra Long-Haul;
  - OSFP 800G ZR/ZR+;
  - QSFP-DD 800G ZR/ZR+;
  - QDD-400G-SR8-S;

- QDD-400G-SR4.2-BD;
- QSFP-200G-SR4-S;
- QSFP-200G-SL4-S;
- QSFP-200G-FR4-S;
- QDD-8x100G-FR;
- QDD-2X400G-FR4;
- 86-MPA-4FH-M;
- 86-MPA-14H2FH-M;
- NC57-MPA-1FH1D-S; and
- NCS1K14-2.4T-K9.

SO ORDERED, this \_\_\_\_ day of \_\_\_\_\_, 202\_\_.

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UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on December 10, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on December 10, 2024, upon the following in the manner indicated:

John G. Day, Esquire  
Andrew C. Mayo, Esquire  
ASHBY & GEDDES  
500 Delaware Avenue, 8th Floor  
P.O. Box 1150  
Wilmington, DE 19899  
*Attorneys for Defendant Ramot at Tel Aviv  
University Ltd.*

*VIA ELECTRONIC MAIL*

Denise De Mory, Esquire  
Corey Johanningmeier, Esquire  
Michael Flynn-O'Brien, Esquire  
Brenda Entzminger, Esquire  
BUNSOE DE MORY LLP  
701 El Camino Real  
Redwood City, CA 94063  
*Attorneys for Defendant Ramot at Tel Aviv  
University Ltd.*

*VIA ELECTRONIC MAIL*

James T. Wilson, Esquire  
Wayne M. Helge, Esquire  
BUNSOE DE MORY LLP  
277 S. Washington St., Suite 210, #1088  
Alexandria, VA 22314  
*Attorneys for Defendant Ramot at Tel Aviv  
University Ltd.*

*VIA ELECTRONIC MAIL*

*/s/ Jennifer Ying*

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Jennifer Ying (#5550)